

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

FILED
NOTICE OF FILING
JUL -7 2025 9:07 A
U.S. District Court
Southern District of Ohio
Western Division

JOHN KLOSTERMAN, et al
Plaintiff,

v.

Case No. 1:25-cv-00312-SJD-KLL

Judge Susan J. Dlott
Magistrate Karen L. Litkovitz

KONZA, LLC, RICHARD BOYDSTON,
and DENTONS BINGHAM
GREENEBAUM LLP, et al.,
Defendants.

PLAINTIFF'S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

Plaintiff John Klosterman respectfully moves this Court pursuant to Federal Rule of Civil Procedure 15(a)(2) for leave to file a Second Amended Complaint to add FRI Mason, LLC d/b/a Keller Williams Advisors Realty and Jennifer Donnathan as defendants.

Good cause exists for this amendment:

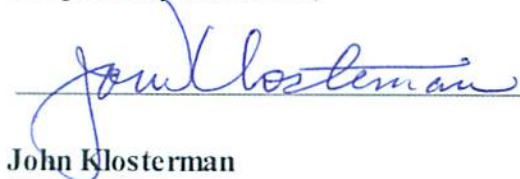
1. **Newly Discovered Evidence:** Through the June 20, 2025 motion for summary judgment (Doc. #27), Plaintiff has documented FRI Mason's hidden corporate identity and Jennifer Donnathan's central role as a "straw woman" for Defendant Boydston in artificially devaluing properties by over \$100,000.

2. **No Undue Delay:** This motion is filed promptly upon discovering the full extent of these defendants' participation in the fraudulent enterprise.
3. **No Prejudice:** Adding these defendants will not prejudice any party as the case is in early stages and the claims arise from the same fraudulent scheme already alleged.
4. **Justice Requires Complete Resolution:** These defendants were integral participants in the "engineered sale," with Donathan acting at Boydston's direction and receiving \$147,401 in commission for facilitating the fraud.

The proposed Second Amended Complaint is attached

WHEREFORE, Plaintiff respectfully requests leave to file the Second Amended Complaint.

Respectfully submitted,



John Klosterman
Pro Se Plaintiff
5615 Sidney Road
Cincinnati, OH 45238

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Second Amended Complaint was served upon all parties listed below on July 7, 2025, by the following method(s):

Service Method: ☐ U.S. Mail, postage prepaid ☐ Email ☐ Other: _____

Parties Served:

1. Konza, LLC c/o Registered Agent
2. Richard Boydston c/o Dentons Bingham Greenebaum LLP
3. Dentons Bingham Greenebaum LLP
4. Tri-State Organization, Inc.

5. Joseph Lentine [Prison address - summons returned, to be served at correctional facility]
6. Angel Strunk [Prison address - summons returned, to be served at correctional facility]
7. Jennifer Donathan
8. Keller Williams Advisors Realty
9. Terry James
10. City of Cincinnati City Solicitor's Office

I declare under penalty of perjury that the foregoing is true and correct.

JOHN KLOSTERMAN Plaintiff Pro Se 5615 Sidney Road Cincinnati, Ohio 45238 Phone:
(513) 250-2610 Email: johncklosterman@gmail.com

John Klosterman Date:



July 7, 2025